

1 WHEREAS plaintiff G.L. commenced this action by filing a civil complaint on September
2 26, 2022 (ECF 1, “Complaint”);

3 WHEREAS a summons was issued on September 26, 2022 to defendants DAVID
4 CANEPA, MELANIE CATANIO, CITY OF FOLSOM, NANCY COCHRANE, DONALD
5 ROWBERRY and ANNE MARIE SCHUBERT (each a “Defendant,” and collectively
6 “Defendants”);

7 WHEREAS plaintiff G.L. has petitioned the Court for appointment of a Guardian ad
8 Litem, with a hearing date set for November 15, 2022;

9 WHEREAS Defendants wish to defer responding to the Complaint until after a Guardian
10 ad Litem is formally appointed so that they need not challenge the plaintiff’s capacity to sue via
11 motions practice and to give the parties the opportunity to sufficiently meet and confer prior to
12 potential motions challenging the Complaint on other grounds;

13 WHEREAS plaintiff’s counsel has informed defense counsel that defendant CITY OF
14 FOLSOM was served with the summons and Complaint on September 29, 2022;

15 WHEREAS plaintiff’s counsel has informed defense counsel that defendants MELANIE
16 CATANIO, DAVID CANEPA, ANNE MARIE SCHUBERT, and NANCY COCHRANE were
17 served with the summons and Complaint on October 3, 2022;

18 WHEREAS defendant COCHRANE denies being served on October 3, 2022, but her
19 counsel has agreed to accept service on COCHRANE’s behalf, effective October 7, 2022, to
20 reduce litigation costs;

21 WHEREAS defendant ROWBERRY has not yet been served with summons and
22 complaint, but his counsel has agreed to accept service on ROWBERRY’s behalf, effective
23 October 7, 2022, to reduce litigation costs;

24 WHEREAS, in the interests of judicial economy, the parties also wish to stipulate that
25 service has been duly effectuated on all Defendants and arrange a common response date for all
26 Defendants;

27 THEREFORE, the parties by and through their respective counsel, hereby stipulate as
28 follows:

1 1. As of October 7, 2022, all Defendants have been served with the summons and
2 Complaint, together with the court orders and notice of magistrate consent dated September 9,
3 2022 (ECFs 4, 4-1, 4-2), and plaintiff's application for guardian ad litem (ECFs 5, 5-1, 5-2 and 5-
4 3);

5 2. All Defendants shall have until November 30, 2022, inclusive, to respond to the
6 Complaint in any manner authorized by Rule 12 of the Federal Rules of Civil Procedure.

7 IT IS SO STIPULATED.

8
9 DATE: October 5, 2022

RIVERA HEWITT PAUL LLP

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11 _____
12 /s/ Wendy Motoooka
13 WENDY MOTOOKA
14 Attorneys for Defendants NANCY COCHRANE
15 and ANNE MARIE SCHUBERT

16
17 | DATE: October 5, 2022

18 PORTER SCOTT
19 A PROFESSIONAL CORPORATION

20
21 DATE: October 5, 2022

22 **GAVRILOV & BROOKS**

23
24 By: _____ /s/ Mary Anne Martin
25 Mary Anne Martin
26 Attorney for Plaintiff G.L.
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ORDER

After considering the Stipulation by and between the parties through their counsel of record, IT IS HEREBY ORDERED THAT:

1. All Defendants have been served with the summons and Complaint in this action, effective no later than October 7, 2022; and

2. Defendants shall have until November 30, 2022, inclusive, to respond to the Complaint in any manner authorized by Rule 12 of the Federal Rules of Civil Procedure.

IT IS SO ORDERED.

DATE: October 6, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE